

1 THE HONORABLE MARCIA J. PECHMAN
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13 UNITED STATES DISTRICT COURT
14 WESTERN DISTRICT OF WASHINGTON
15

16 HUONG HOANG, an individual
17

18 Plaintiff,
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20 v.
21

22 AMAZON.COM, INC., a Delaware
23 corporation, and IMDB.COM, INC., a
24 Delaware corporation,
25

26 Defendants.
27

28 No. 2:11-CV- 01709-MJP
29

30 **DECLARATION OF BREENA M. ROOS
31 IN SUPPORT OF IMDB.COM, INC.'S
32 REPLY IN SUPPORT OF MOTION FOR
33 SUMMARY JUDGMENT**

34 I, Breena M. Roos, hereby declare as follows:
35

36 1. I am an attorney with Perkins Coie LLP. I am one of the attorneys representing
37 defendants Amazon.com, Inc. and IMDB.com, Inc. in the above-referenced matter. I make this
38 declaration based on personal knowledge and review of records and correspondence relating to
39 the above-referenced matter.

40 2. Attached hereto as Exhibit A is a true and correct copy of IMDB.com, Inc.'s
41 webpage regarding the film titled "Consequences," *available at*
42
43 http://www.imdb.com/title/tt0936466/?ref_=fn_al_tt_2 (last accessed December 21, 2012).
44
45

46 DECLARATION OF BREENA ROOS IN SUPPORT
47 OF IMDB.COM, INC.'S REPLY ISO MOTION FOR
48 SUMMARY JUDGMENT (No. CV- 01709-MJP) – 1
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51 24976-0480/LEGAL25445831.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

3. Attached hereto as Exhibit B is a true and correct copy of results of a search for the title "Consequences" in IMDb.com, Inc.'s database, *available at* <http://www.imdb.com/find?q=consequences&s=all> (last accessed December 21, 2012).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: December 21, 2012 By: /s/ Breena M. Roos
Breena M. Roos

DECLARATION OF BREENA ROOS IN SUPPORT OF
IMDB.COM, INC.'S REPLY ISO MOTION FOR
SUMMARY JUDGMENT (No. CV- 01709-MJP) - 2

Perkins Coie LLP
1201 Third Avenue, Suite 4800
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Phone: 206.359.8000
Fax: 206.359.9000

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3 **CERTIFICATE OF SERVICE**
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I certify that on December 21, 2012, I electronically filed the foregoing DECLARATION
OF BREENA ROOS with the Clerk of the Court using the CM/ECF system, which will send
notification of such filing to the following attorneys of record

14 **Derek Alan Newman** _____
15 **Keith Scully** _____
16 **Charlotte Williams** _____
17 Newman Du Wors LLP _____
18 1201 Third Avenue, Ste 1600 _____
19 Seattle, WA 98101 X_ Via ECF _____
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I certify under penalty of perjury that the foregoing is true and correct.

DATED this 21st day of December, 2012.

s/ Breena Roos

Charles C. Sipos, WSBA No. 32825
Breanna M. Roos, WSBA No. 34501
Ashley Locke, WSBA No. 40521
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Attorneys for Defendants Amazon.com, Inc.
and IMDb.com, Inc.

DECLARATION OF BREENA ROOS IN SUPPORT OF
IMDB.COM, INC.'S REPLY ISO MOTION FOR
SUMMARY JUDGMENT (No. CV-01709-MJP) - 3

EXHIBIT A

IMDb

Consequences (2006)

36 min · Thriller

Your rating:  Rating: 3.2 from 96 users
Reviews: 4 user · 7 critic

Consequences introduces us to Max, Jimmy, Norm, Nick and Jason at the age of eighteen. Friends since early childhood... [See full summary](#)

Director: Stephen Stahl
Writer: Anthony C. Hippel
Stars: Ernest E. Brown, Chris Cannon and Marques Chaney
[See full cast and crew](#)

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Photos

[4 photos](#)

Cast

Credited cast:

| | | |
|---|--|--------------------|
|  | Ernest E. Brown | Dealer- Bar Patron |
|  | Chris Cannon | Norm |
|  | Marques Chaney | Moose |
|  | Dave Cooperman | Tipper |
|  | Gina Maria Destra | Maria |
|  | Jennifer Flint | Club Dancer |
|  | Effie Hortis | Sophia |
|  | Nicholas Kattar | Max |
|  | Nicholas Joseph Kattar | Max |
|  | Evy Lutzky | Cindy |
|  | Melissa Marino | Party Girl |
|  | Paul Marron | Jason |
|  | Nicole Nocintino | Amber |
|  | Adam Ratcliffe | Nick |
|  | Michael Tranzilli | Jimmy |

[Full cast and crew](#)

Storyline

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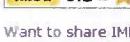
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Consequences introduces us to Max, Jimmy, Norm, Nick and Jason at the age of eighteen. Friends since early childhood, they have bonded deeper than natural brothers. As eighteen-year-old men, we share with them their dreams, loves, and friendships as well as life's hopes and frustrations. We, once again, meet them at age forty and learn how their lives have unfolded as we experience their marriages, strengths and disappointments. Together they are capable of celebrating with each other their emotions in an open and honest fashion. The group is together now on their annual football weekend, this year in Philadelphia. While bonding and enjoying the vibrant nightlife, they become separated only to find a darkness they have never known. It becomes a struggle of life or death. The friends find themselves disconnected from each other but ultimately gain a stronger respect for one another than they ever thought possible... Written by [Anonymous](#)

[Plot Summary](#) [Add Synopsis](#)

Plot Keywords: [Bare Chested Male](#) [Bare Chested Male Bondage](#) [Blood](#) [Non Statutory](#)
[Female On Male Anal Rape](#) [Torture](#)

Genres: [Thriller](#)

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Details

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Official Sites: [Official site](#) [Official site](#) [Add/edit official sites](#)

Country: [USA](#)

Language: [English](#)

Also Known As: Playroom [See more](#)

Filming Locations: [Bucks County, Pennsylvania, USA](#) [See more](#)

Box Office

Budget: \$450,000 (estimated)

[See more](#)

Company Credits

Production Co: [DIVE, FIN Pictures, YNOT Productions](#) [See more](#)

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User Reviews

 **Welcome to the Gay Hostel?**
 21 October 2008 | by [FrightMeter](#) ([FrightMeter.Com](#)) - [See all my reviews](#)

Wow. Not sure where to begin with this one. It wasn't what I was expecting, that is for certain. In fact, for about the first 45 minutes of the film, I was pondering why it was even classified as horror on Netflix, as it was about the farthest thing from horror I have seen. However, the film almost immediately shifts tone and focus about halfway through and becomes a extreme "Hostel" wannabe. Unfortunately, it is not a very good one.

The film centers on five middle-age guys who have been friends since high school. Now most are married and have kids, they all still know each other extremely well, including dirty secrets, such as infidelities and other degenerate behavior over the years. One evening, the decide to go into downtown Philadelphia for an annual football get together. Instead, two of the guys seek out women to have sex with (even though they are married). The others sit around and bitch about their unfaithful, sex-hungry pals while getting drunk. Unfortunately for the two who sought sex, they wake up chained to beds on a small, isolated room. Soon, a group of shady guys (and gals) reveal themselves and being to torture the two in very graphic and sexual ways.

The Good: Um.....some decent looking guys with hot bodies who are naked for the second half of the film to look at?

The Bad: Everything else. The whole gay element that is played up in this film is the last thing that bothered me (trust me there). It's the fact that this is an incompetently directed, poorly acted, and horribly written film. As I mentioned, the film completely shifts tone halfway through...at a point where I suspect most have stopped watching due to the sheer boringness of the first half of the film. The acting is atrocious, particularly from the guy who portrays the main villain. His screaming, tyrannical rants are cringeworthy they are so bad. The guys who are being tortured really, most of the time, act like they could care less. Characters do stupid things. Note: If your captor is actually being nice to you and helping you smoke a cigarette while explaining what you need to do to survive, it is probably NOT a good thing to shove that same cigarette into his face WHILE YOU ARE STILL CHAINED TO THE BED! Once the torture starts, it is somewhat brutal, I suppose. The two are anally raped, have their genitals mutilated, and are cut and sliced various ways. There is definitely a blatant gay undertone to this film, so if that bothers you, avoid. The ending is....well....strange for lack of a better word and really left a bad-taste in my mouth. It certainly didn't pack the punch that I suspect the filmmakers thought it would. On top of all this, the film looks cheap and amateurish and the direction is unfocused and lazy. And most of the time with these types of films, they are effective because the audience has an investment in or liking of at least one of the characters. The writer made these characters such jerks and unflattering individuals that we don't care what happens to any of them.

This is NOT an enjoyable film to watch, not because of the violence, but because of how much of a mess it is. It tries way too hard to shock toward the end and fails because everything we see, including the performances, look so unrealistic and phony that we don't buy any of what is happening in the first place.

My Grade: F

3 of 4 people found this review helpful. Was this review helpful to you? [Yes](#) [No](#)

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-  Collateral Consequences (2010) (Video)
-  Lake Consequence (1993) (TV Movie)
-  The Consequences of Love (2004)
-  Truth or Consequences, N.M. (1997)
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- [consequence \(3 titles\)](#)
- [unintended-consequences \(14 titles\)](#)

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